

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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SUSAN SABOL, VALERIE DONE, and : CIVIL ACTION NO.
KATHLEEN KLODNER on behalf of : 2:11-cv-04586-KM-MAH
themselves and all others similarly :
situated, : **DECLARATION OF JILL**
Plaintiffs, : **FUKUNAGA RE: NOTICE AND**
: **CLAIMS ADMINISTRATION**
-against- :

HYDROXATONE LLC and :
ATLANTIC COAST MEDIA :
GROUP LLC, :

Defendants. :
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DECLARATION OF JILL FUKUNAGA RE:
NOTICE AND CLAIMS ADMINISTRATION

1. I am employed as an Assistant Director by Gilardi & Co., LLC (“Gilardi”), located at 3301 Kerner Blvd., San Rafael, California. Gilardi was appointed as the Settlement Administrator in this matter and is not a party to this action. I have overseen and continue to oversee all aspects of notice and claims administration with regard to this case. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. The purpose of this declaration is to apprise the Court and parties with regard to notice and administration activities that have occurred since my previous declaration dated May 30, 2013.

3. As noted in my May 30, 2013 declaration, Gilardi, through its third-party vendor, sent E-Mail Notices to 1,098,849 class members for whom e-mail addresses were made available. Subsequently, the vendor notified Gilardi that approximately 566,952 of the E-Mail Notices bounced back or were otherwise deemed undeliverable. Pursuant to the terms of the Settlement Agreement and Preliminary Approval Order, on May 30, 2013, Gilardi mailed 564,915 Postcard Notices to all class members whose E-Mail Notices bounced back or were otherwise undeliverable.

4. As of July 5, 2013, there have been 109,471 visits to the case website (www.hydroxatonesettlement.com).

5. The postmark deadline for submitting claims is August 15, 2013. To date, Gilardi has received 36,005 timely claims. Attached hereto as Exhibit A are a Weekly Statistics Report and chart detailing the claims which Gilardi has received and processed as of July 5, 2013.

6. The postmark deadline for submitting requests for exclusion from the settlement was June 25, 2013. As of July 5, 2013, Gilardi has received and processed a total of 2,227 requests for exclusion. Of these, 2,183 were timely and

44 were late. A list of the names of class members who submitted requests for exclusion is attached hereto as Exhibit B.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8th day of July, 2013 at San Rafael, California.



JILL FUKUNAGA